

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

RYAN KAISER, on behalf of himself and
others similarly situated persons,

Plaintiff,

V.

REVIVAL HOME HEALTHCARE
SERVICES, INC. and SYLVESTER C.
UDEZE,

Defendants.

[illegible]

Civil Action No. 4:18-cv-341

JURY DEMAND

DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION TO COMPEL

DOCUMENT PRODUCTION AND BRIEF IN SUPPORT

COME NOW, Defendants, REVIVAL HOME HEALTHCARE SERVICES, INC. (hereinafter referred to as “Revival”) and SYLVESTER C. UDEZE, (hereinafter referred to as “Udeze” and together with Revival, “Defendants”) and file this their *Response to Plaintiff’s Motion to Compel Document Production and Brief in Support*, (hereinafter referred to as the “Motion”) and would respectfully show the Court the following:

I. BACKGROUND FACTS

1. On September 28, 2018, Plaintiff's Counsel served Defendants with a Request for Admissions and Request for Production of Documents. Defendants have complied and have provided Plaintiff with all responsive documents they have located. Defendants have turned over all documents in their possession, custody or control. Defendants are not withholding any privilege documents.

II. PRAYER

WHEREFORE, Defendants respectfully pray that the Court deny Plaintiff's Motion to Compel Document Production and for such other and further relief, both general and specific, to which they may be justly entitled.

Respectfully submitted,

THE CRAMER LAW GROUP

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CERTIFICATE OF SERVICE

I hereby certify that on April 25, 2019 I electronically filed the foregoing with the clerk of the Court using the CM/ECF system that will send notice of the electronic filing to all parties of record.

/S/ MICHAEL R. CRAMER
Michael R. Cramer